

Harmony Law, LLC  
155 E. Boardwalk Drive, Suite 400  
Fort Collins, CO 80525  
Telephone: 970-488-1857  
hutchins@harmony.law  
theriault@harmony.law

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

Virgin Enterprises Limited,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:19-cv-220-NDF
	)	
Virginic LLC, Virginic Labs LLC,	)	
Virginic PL Sp. z o.o., Paramount Labs	)	
77 LLC, and Berenika Maciejewicz,	)	
	)	
Defendants.	)	

**MOTION TO WITHDRAW**

Clyde Hutchins and Melissa Theriault of Harmony Law, LLC hereby move to withdraw as counsel of record for Virginic LLC, Virginic Labs LLC, and Paramount Labs 77 LLC (hereinafter “Defendants”), and affirm to the Court, the clients, and all other attorneys and parties of record:

1. All actions required in this matter have been completed. The action was dismissed with a consent judgment. Pursuant to the consent judgment, the Defendants have filed their final report. There are no unresolved matters currently pending before the Court. Any written

orders have been submitted and entered by the Court and complied with by the withdrawing attorneys.

2. The Defendants have terminated the representation of Harmony Law, LLC and its attorneys from any further representation of Defendants in this matter.
3. The attorneys wish to withdraw and have given actual notice to the clients prior to filing this notice.
4. The Defendants have consented to withdrawal of counsel. (See attached consent to withdrawal forms.)
5. Opposing counsel has been contacted regarding this motion. The lead counsel, Joseph Norvell's email response was that he was in trial through October 3, 2020. It is not clear whether opposing counsel objects to withdrawal.
6. Virginic LLC, Virginic Labs LLC, and Paramount Labs 77 LLC have been informed that they are responsible for obtaining Wyoming counsel to represent them in the event that there are any new developments in this matter.
7. Notice of this motion to withdraw has been served on all the Defendants by regular mail as seen by the certificate of service.

WHEREFORE, Defendants and Counsel of record for Virginic LLC, Virginic Labs LLC, and Paramount Labs 77 LLC respectfully request that the Court grant this

motion and allow the withdrawal of Clyde Hutchins and Melissa Theriault of Harmony Law, LLC.

Respectfully submitted this 25th day of September, 2020.

Attorneys for Defendants Virginic LLC,  
Virginic Labs LLC, and  
Paramount Labs 77 LLC

/s/ Clyde Hutchins

Clyde Hutchins, Bar No. 6-3549  
Harmony Law, LLC  
155 E. Boardwalk Drive, Suite 400  
Fort Collins, CO 80525  
Telephone: (970) 488-1857  
hutchins@harmony.law

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 25th, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

### **Attorneys for Plaintiff**

Christian S Morgan  
Joseph V Norvell  
Thomas M Monagan, III  
NORVELL IP LLC  
333 South Wabash Avenue, Suite 2700  
Chicago, IL 60604

Timothy Lance Woznick  
CROWLEY FLECK PLLP  
237 Storey Blvd, Suite 100  
Cheyenne, WY 82001-3799

With copies sent to the clients via regular US mail, postage pre-paid to the following addresses:

Virginic LLC  
30 N. Gould Street, Suite R  
Sheridan, WY 82801

Virginic Labs LLC  
30 N. Gould Street, Suite 6669  
Sheridan, WY 82801

Paramount Labs 77 LLC  
30 N. Gould Street, Suite 3666  
Sheridan, WY 82801

/s/ Clyde Hutchins